

EXHIBIT GG

(Redacted Portions Filed Under Seal)

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE)
COMMISSION,)
)
Plaintiff,) Case No.
) 1:23-cv-1346 (JSR)
v.)
)
TERRAFORM LABS PTE LTD. and)
DO HYEONG KWON,)
)
Defendants.)
_____)

VIDEOTAPED DEPOSITION OF BRIAN CURRAN
Hermosa Beach, California
Thursday, September 7, 2023

Stenographically Reported By:
LINDSAY PINKHAM
CA CSR 3716, CCRR 17
Job No. 230907LP

10:10:03 1 A The government.

10:10:05 2 Q When you say "the government," who do you mean?

10:10:08 3 A Like the specific agencies?

10:10:10 4 Q Yes.

10:10:11 5 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10:10:31 10 A Yeah. All the ones that were relevant that I

10:10:34 11 still had stored.

10:10:35 12 Q Did you on Telegram ever set the messages to

10:10:41 13 disappear?

10:10:42 14 A No.

10:10:42 15 Q Did you ever communicate with other employees

10:10:45 16 at Terraform via an encrypted messaging app known as

10:10:51 17 Signal?

10:10:51 18 A Very rarely.

10:10:53 19 Q And what do you mean by "very rarely"?

10:10:55 20 A It's pretty difficult to use, so it's not like

10:10:58 21 user friendly. The reason that Telegram is so popular

10:11:02 22 is because it's encrypted, but it's also like very user

10:11:06 23 friendly for groups and business.

10:11:07 24 Q So is "very rarely" once a month? Can you

10:11:13 25 quantify that?

REPORTER'S CERTIFICATE

I, Lindsay Pinkham, CSR No. 3716, a Certified Shorthand Reporter in and for the State of California, do hereby certify:

That the witness named in the foregoing deposition, prior to being examined, was by me first duly sworn; That said deposition was taken before me through remote means at the time and therein set forth and was taken down by me in shorthand and thereafter transcribed into typewriting under my direction and supervision;

That said deposition is a true record of the testimony given by the witness and of all objections made at the time of the examination;

That the dismantling, tampering with, unsealing or unbinding of the original transcript will render the reporter's certificate null and void.

Before completion of the deposition, review of the transcript was not requested/offered.

I further certify that I am neither counsel for nor related to any party to said action, nor in anywise interested in the outcome thereof.

Dated this 13th day of September, 2023.

-----*Lindsay Pinkham*-----

Lindsay Pinkham, CSR 3716